

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
BRUNSWICK DIVISION

EDWARD HANSON,	*	
	*	
Plaintiff,	*	
	*	
v.	*	Civil Action No.:
	*	2:20-CV-00061-LGW-BWC
GEORGIA DREAMWORKS REALTY, LLC,	*	
	*	
Defendant.	*	

ANSWER AND DEFENSES OF DEFENDANT

COMES NOW Georgia Dreamworks Realty, LLC, defendant in the above-styled action, and hereby presents the following answer and defenses to plaintiff's complaint.

FIRST DEFENSE

The complaint fails to state a claim against the defendant upon which relief can be granted.

SECOND DEFENSE

**(Responsive Answer)**

The defendant responsively answers the enumerated paragraphs of plaintiff's complaint and the various allegations therein contained as follows:

1.

The defendant denies the allegations contained in paragraph 1 of plaintiff's complaint.

2.

The defendant admits that the United States District Court for the Southern District of Georgia, Brunswick Division, has

subject matter jurisdiction over this action. The defendant denies the remaining allegations contained in paragraph 2 of plaintiff's complaint.

3.

The defendant admits that the United States District Court for the Southern District of Georgia, Brunswick Division, has personal jurisdiction over defendant because defendant has its principal place of business in Appling County, Georgia. Defendant further admits that it is a limited liability company organized under the laws of the State of Georgia and registered with the Georgia Secretary of State. The defendant denies the remaining allegations contained in paragraph 3 of plaintiff's complaint.

4.

The defendant admits that venue is proper in the United States District Court for the Southern District of Georgia, Brunswick Division. The defendant denies the remaining allegations in paragraph 4 of plaintiff's complaint.

5.

For want of sufficient information and knowledge upon which to form a belief as to the truth thereof, the defendant can neither admit nor deny the allegations contained in paragraph 5 of plaintiff's complaint.

6.

For want of sufficient information and knowledge upon which

to form a belief as to the truth thereof, the defendant can neither admit nor deny whether it listed the home in question "on numerous listing websites." The defendant admits the remaining allegations contained in paragraph 6 of plaintiff's complaint.

7.

For want of sufficient information and knowledge upon which to form a belief as to the truth thereof, the defendant can neither admit nor deny the allegations contained in paragraph 7 of plaintiff's complaint.

8.

For want of sufficient information and knowledge upon which to form a belief as to the truth thereof, the defendant can neither admit nor deny the allegations contained in paragraph 8 of plaintiff's complaint.

9.

For want of sufficient information and knowledge upon which to form a belief as to the truth thereof, the defendant can neither admit nor deny the allegations contained in paragraph 9 of plaintiff's complaint.

10.

The defendant admits that it utilized some of the photographs attached to the complaint as Exhibit "B" in its listing for sale of the home located at 84 Beecher Road, Hazlehurst, Georgia 31539. For want of sufficient information and knowledge upon which to form a belief as to the truth

thereof, the defendant can neither admit nor deny the remaining allegations contained in paragraph 10 of plaintiff's complaint.

11.

The defendant admits the allegations contained in paragraph 11 of plaintiff's complaint. In further response to paragraph 11 of plaintiff's complaint, the defendant shows that it was not aware that plaintiff contends said photographs were registered with the United States Copyright Office.

12.

In response to paragraph 12 of plaintiff's complaint. The defendant reasserts and restates each and every defense, answer, and response with reference to paragraph numbers 1 through 11 of plaintiff's complaint with the same effect as if repeated here, denying each allegation herein unless expressly admitted or specifically answered otherwise.

13.

For want of sufficient information and knowledge upon which to form a belief as to the truth thereof, the defendant can neither admit nor deny the allegations contained in paragraph 13 of plaintiff's complaint.

14.

For want of sufficient information and knowledge upon which to form a belief as to the truth thereof, the defendant can neither admit nor deny the allegations contained in paragraph 14 of plaintiff's complaint.

15.

The defendant denies the allegations contained in paragraph 15 of plaintiff's complaint.

16.

The defendant denies the allegations contained in paragraph 16 of plaintiff's complaint.

17.

In response the PRAYER FOR RELIEF contained in plaintiff's complaint, the defendant denies plaintiff's prayers for relief.

18.

In response to plaintiff's DEMAND FOR A JURY TRIAL, defendant also demands a trial by a twelve person jury pursuant to FED. R. CIV. P. 38.

This 19<sup>th</sup> day of June, 2020.

**YOUNG, THAGARD, HOFFMAN, LLP**

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BY: /s/ J. Holder Smith, Jr.  
J. Holder Smith, Jr.  
State Bar No. 661105  
Attorney for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing **ANSWER AND DEFENSES OF DEFENDANT** upon the following using the CM/ECF system which will send notification of such filing to the following:

Richard P. Liebowitz  
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11 Sunrise Plaza, Suite 305  
Valley Stream, NY 11580  
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This 19<sup>th</sup> day of June, 2020.

BY: /s/J. Holder Smith, Jr.  
J. Holder Smith, Jr.  
Attorney for Defendant